Responses to Comments from EPA on
Field Change Request (FCR) 003, Parcel E Remedial Action, Phase 2, Hunters Point Naval Shipyard (HPNS),
San Francisco, California, February 2021

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1	Worksheets 15.2 and 15.11	a. Worksheet #15.2: The "Analyte Group" is listed as "Radionuclides (confirmation sampling)," but should be listed as "Radionuclides (confirmation and waste characterization sampling)." **Revise this worksheet to correct the omission**. b. Worksheet #15.11: Cobalt-60, one of the seven ROCs listed in the ROD, has been removed from the analyte list for import soil sampling with no rationale as to its elimination. The latter is inconsistent with the overarching statement to test import soil for all ROCs. **Add Cobalt-60 to the analyte list for import fill or provide an acceptable rationale for its removal and exception**.	*a. Per the NAVFAC Southwest Quality Assurance Officer as stated in the NAVFAC Southwest Environmental Restoration Data Quality Council Newsletter Volume 1 (January 2017): "The management of IDW involves operations that include sample collection, workplace and site safety, field and lab testing, waste storage and disposal. The details of these operations, however, should be included in a Waste Management Plan (WMP)/IDW Management Plan as an Appendix to the associated Work Plan .... Unless directly related to the project Conceptual Site Model (WS 10) or Project Quality Objectives (WS 11), do not include the list of analytes in **WS 15**/Analyte Reference Limits and Evaluation Table, or in associated WS's." On this basis, no changes have been made to the FCR SAP Worksheet #15.2.* *b. Cobalt-60 has been added to the list for import fill material on FCR SAP Worksheet #15.11.*
2	Worksheets 17.1 and 18	a. According to SAP Worksheet #17.1, Section 17.4, "[a] minimum of 10 percent of the samples will be randomly selected for analysis by gas proportional counting for total strontium." No rationale is provided for either reducing the testing for strontium, or for choosing 10% of the samples. **Revise FCR 003 to include the rationale for the sampling plan for strontium**. b. Moreover, Worksheet #18 was not revised to reflect the change in sampling. **Revise Worksheet #18 accordingly**.	*a. The following text has been added as the second paragraph of SAP Worksheet #17.1, Section 17.4, "**Rationale for the sampling strategy presented for Sr-90 is as follows: the presence of Sr-90 primarily would be attributed to fission products associated with Operations Crossroads and the decontamination of ships that participated in atomic weapons testing. Standard procedure is to analyze all samples for Cs-137. Because Sr-90 and Cs-137 are both fission products that are found together, the Sr-90 analysis of a randomly-selected 10 percent of the collected samples serves as a second verification (beyond that for Cs-137) that fission products are not present as contaminants in the material."*** *b. Worksheet 18A has been added to the FCR.*
3	Worksheet 17.1	Section 17.5 of the worksheet states, "The backfill will be composed of clean imported fill material that has been analyzed to confirm that the material does not contain site-specific COCs, ROCs, or other contaminants, based on the nature of the fill source in accordance with the DTSC 'Information Advisory, for Clean Imported Fill Material' (DTSC, 2001)." (emphasis added).	*The third sentence of Section 17.5 of the FCR SAP Worksheet # 17.1 has been revised for clarity as follows (new text in bold): The backfill will be composed of clean imported fill material that has been analyzed to confirm that the material does not contain site-specific COCs, ROCs, or other contaminants **above the project screening criteria**, based on the nature of the fill source in*

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		At best, this statement is misleading as it indicates that the fill material does not contain contaminants. Rather, based on our knowledge of the Parcel E-2 import soil, the Navy has determined that the import fill material is acceptable for use based on Project Screening Limits, not on the laboratory's Project Quantitation Limit Goal, the latter which may well detect such COCs ROCs, or other contaminants and render the current statement false. **Revise so as not to inadvertently mislead regulators or the public.**	*accordance with the DTSC "Information Advisory, for Clean Imported Fill Material" (DTSC, 2001).*